

THE AMIN LAW GROUP, NV., LTD.

Ismail Amin, Esq. (9343)
Matthew K. Schriever, Esq. (10745)
5852 S. Durango Dr., Suite 105
Las Vegas, NV 89113
Telephone: 702-990-3583
Fax: 702-441-2488
iamin@talglaw.com
mschriever@talglaw.com

Attorneys for Fundbox

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

Steven E. Durham,

Debtor.

Case No. BK-S-19-17961-abl
Chapter 13

**LIMITED OPPOSITION TO MOTION
FOR SANCTIONS**

**Hearing Date: November 10, 2021
Hearing Time: 9:30 a.m.**

COMES NOW Fundbox ("Fundbox"), by and through counsel and files this limited opposition to the Debtor's Motion For Sanctions.

The undersigned has only recently been retained in this matter and is still reviewing underlying documents and pleadings relative to this dispute. Debtor's counsel has also recently indicated that they would provide additional correspondence relative to the dispute, but to date have not done so. The undersigned has requested that Debtor's counsel continue this matter to allow them time to provide that correspondence and for the undersigned to investigate this matter, however Debtor's counsel has indicated that it would not agree to a continuance. Accordingly, the undersigned requests that the Court continue this matter for 30 days to allow the undersigned to conduct a thorough review of this matter and determine whether a motion to set aside the order

1 should be filed, the sufficiency of debtor's unsubstantiated claim that he has suffered \$30,000
 2 damages in forgivable loans,¹ if proper service of the underlying motions were proper, and
 3 whether or not debtor's counsel acted with care or had a duty to communicate and warn Fundbox
 4 of potential wire fraud given similar wire fraud that happened to debtor's counsel in another prior
 5 case in which debtor's counsel argued, "Freedom Law Firm had no prior knowledge of the fraud
 6 and notified Pyatt Silvestri immediately when it discovered the possibility of fraud."² Allowing a
 7 continuance of this matter would ensure that this matter is decided on the merits.
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9 DATED November 9, 2021.

10 **THE AMIN LAW GROUP, NV., LTD.**

11 */s/ Ismail Amin*

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 14 Ismail Amin, Esq. (9343)
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 17 Las Vegas, NV 89113

18 *Attorneys for Creditor*
 19 Fundbox

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 26 ¹ While debtor provides a self-serving Declaration regarding these loans, no further evidence of the loans has been
 27 provided.

28 ² See *In re: Williams*, 19-16599-abl, Debtor's Reply In Support Of Debtor's Motion To Enforce Settlement Agreement,
 Doc #104 at 9:11-12.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of The Amin Law Group, Nv., Ltd. and that I caused a copy of the **LIMITED OPPOSITION TO MOTION FOR SANCTIONS** to be served by electronic service pursuant to Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada. The above-referenced document was electronically filed on the date hereof and served through Notice of Electronic Filing automatically generated by that Court's facilities.

DATED: November 9, 2021.

/s/ Deborah Lien

An employee of The Amin Law Group, Nv., Ltd.